<u>**REMARKS**</u>

Claims 1-41 are currently pending in the subject application and are presently under consideration. Claims 1, 4-7, 9-15, 17, 19-27, 29-32, 35, and 38-40 have been amended as shown on pp. 2-7 of the Reply. Claim 8 has been cancelled herein without prejudice or disclaimer. Applicant's representative thanks the Examiner for the courtesies extended during the interview of June 13, 2007, in which it was indicated that the amendments overcome one or more of the cited references.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I.   Rejection of Claims 1-30, and 33-37 Under 35 U.S.C. §102(b)

Claims 1-30, and 33-37 stand rejected under 35 U.S.C. §102(b) as being anticipated by Liddy *et al.*, U.S. Patent No. 6,006,221 (Liddy *et al.*). Withdrawal of the rejection is requested for at least the following reason. Liddy *et al.* does not expressly or inherently describe each and every aspect set forth in the subject claims.

> A single prior art reference anticipates a patent claim only if it ***expressly or inherently describes each and every limitation*** set forth in the patent claim. *Trintec Industries, Inc. v. Top-U.S.A. Corp.,* 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California,* 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ***The identical invention must be shown in as complete detail as is contained in the … claim.*** *Richardson v. Suzuki Motor Co.,* 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

Applicant's claimed subject matter relates generally to database systems, and more particularly to systems and methods that facilitate translation of data and metadata stored in the database. To this end, amended independent claim 1 recites *a translation component that retrieves data in accordance with the requests and returns the data to the user in a specified language, the translation component comprising an inference component that, **upon retrieval**, translates result data into one or more languages, the inference component including a **context analyzer** component to provide a **linguistically accurate translation***. An advantage of such a system is that it presents a refined, more linguistically accurate and readable translation than a surface-level, gloss translation. Liddy *et al.* does not disclose or suggest at least these novel aspects.

Liddy *et al.* relates to multilingual document retrieval. The reference discloses a document retrieval technique that enables a user to enter a query in a supported language, and retrieve documents from a database composed of documents in at least one other language than in which the query was entered. After retrieval, the system performs a surface-level, gloss transliteration, sufficient for a reader not fluent in the original document's language to gain a basic understanding of the document's contents (*See* col. 3, ll. 11-14, 62-64). Liddy *et al.* provides a multilingual mapping terminology manager to aid the translation process in cases with industry specific or arcane terminology (*See* col. 22, ll. 48-53). This feature is simply an extended dictionary component that assists in facilitating translations when special terminology is found in a document. Liddy *et al.* also provides translation utilizing local context to aid disambiguation (*See* col. 11, ll. 62-65). Liddy *et al.* notes, however, that by the time a user is entering queries into the system, the relevant document databases **will have been processed and annotated** (*See* col. 6, ll. 25-29). Liddy *et al.*, in contrast to the claimed subject matter, discloses translation utilizing local context **during pre-processing, before a document is attached to or retrieved from the database.**

The claimed subject matter provides *translation of data in context,* ***upon retrieval,*** *utilizing a context analyzer component.* Thus, Liddy *et al.* fails to disclose utilizing context information to facilitate a linguistically accurate translation of a data ***after it is retrieved***, as claimed in the subject matter.

Additionally, amended independent claims 11, 20, 22, 29, and 35 recite aspects similar to claim 1, namely, a system or method that accepts queries, executes the query to obtain a result, and translates the query result, ***upon retrieval of the data***, *utilizing context information to facilitate a* ***linguistically accurate translation***.

In view of the foregoing, it is readily apparent that Liddy *et al.* does not disclose or suggest all claimed aspects, and therefore this rejection should be withdrawn.

II. Rejection of Claims 38-41 Under 35 U.S.C. §102(b)

Claims 38-41 stand rejected under 35 U.S.C. §102(b) as being anticipated by Park *et al.*, U.S. Patent No. 6,064,951 (Park *et al.*). Withdrawal of the rejection is requested for at least the following reason. Park *et al.* does not expressly or inherently describe each and every aspect set forth in the subject claims.

> A single prior art reference anticipates a patent claim only if it ***expressly or inherently describes each and every limitation*** set forth in the patent claim. *Trintec Industries, Inc. v. Top-U.S.A. Corp.,* 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California,* 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ***The identical invention must be shown in as complete detail as is contained in the … claim.*** *Richardson v. Suzuki Motor Co.,* 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

Applicant's claimed subject matter relates generally to databases, and more particularly toward performing an operation of a command, translated from one language to another, on a database. To this end, amended independent claim 38 recites *a method of interacting with a database comprising: specifying a command in a first language; receiving the command and translating the command into a second language; performing an operation on a database in accordance with the command; and **utilizing context information** to facilitate translations in at least one of the performance of the operation on the database or translation of a queried result, **upon retrieval**, to provide a linguistically accurate translation.* An advantage of such a system is that it provides database users with a linguistically accurate translation of queried results or performance of a command on the database. Park *et al.* does not disclose or suggest at least these novel aspects.

Park *et al.* relates to a multilingual query transformation system. Park *et al.* discloses document retrieval techniques that enable a user to enter a query in a supported language, and retrieve documents from a database composed of documents in at least one other language than in which the query was entered. Unlike the claimed subject matter, Park *et al.* states that it is **unnecessary to modify the information retrieval system** and that it is only necessary to add a multilingual **query transformation system** (*See* col. 7, ll. 36-39). Park *et al.* discloses transforming a query from a first language into a second language and executing the transformed query. Park *et al.* does not disclose **utilizing context information** to translate at least one of the query result or to facilitate translations required during performance of an operation on a database. Thus, Park *et al.* fails to disclose utilizing context information to translate at least one of the query result or to facilitate translations required during performance of an operation on a database, as claimed in the subject matter.

In view of the foregoing, it is readily apparent that Park *et al.* does not disclose or suggest all claimed aspects, and therefore this rejection should be withdrawn.

III.   Rejection of Claims 31, 32 Under 35 U.S.C. §103(a)

Claims 31 and 32 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Liddy *et al.* in view of Park *et al.*. It is respectfully submitted that this rejection should be withdrawn for the following reasons. Liddy *et al.* and Park *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject amended claims. In particular, Liddy *et al.* does not make up for the aforementioned deficiencies of Park *et al.* with respect to independent claim 29 (from which claims 31 and 32 depend). Therefore, it is respectfully submitted that this rejection be withdrawn.

<u>CONCLUSION</u>

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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